Department of Toxic Substances Control

Maureen F. Gorsen, Director
1515 Tollhouse Road
Clovis, California 93611

Linda S. Adams
Secretary for
Environmental Protection

Arnold Schwarzenegger
Governor

December 1, 2008

Ms. Jill Yaeger
Environmental Health Director
2037 West Cleveland Road, MS-E
Madera, California 93637

REVIEW OF DRAFT REMOVAL ACTION WORKPLAN DATED "APRIL 21, 2008 (REVISED JULY 25, 2008)"; FORMER NORTH FORK MILL SITE AT 57839 ROAD 225, NORTH FORK, CA 93643

Dear Ms. Yaeger:

The above draft Removal Action Workplan (RAW) replaces the draft RAW dated April 21, 2008 and addresses comments conveyed in Department of Toxic Substances Control (DTSC) correspondence dated June 17, 2008. The draft RAW includes plans for the removal of near surface soil in the former dip tank area and includes plans for the removal of a waste pile. The Department of Toxic Substances (DTSC) has completed the review of the draft RAW. At this time the document can be considered approved for public comment.

The draft RAW and attached Notice of Exemption will need to undergo a 30-day public review and comment period. This review and comment period will need to commence after the pending Public Notice and Fact Sheet are finalized.

The RAW will need to be finalized after the 30-day public review and comment period ends. If comments are received, DTSC will respond to the comments and will identify any needed changes to the final RAW.

The concrete to be removed in the former dip tank area should be sampled and properly managed. The final RAW should note these activities will be completed. During the RAW implementation confirmation soil samples should also be collected from the area below and near the area where a steel plate was encountered during previous assessment work. The final RAW should also note this. Recently, information was provided which indicates that "oil like" material was detected during some recent trenching activities (upper log deck area?). It was also indicated that a possible waste disposal area (landfill?) was identified. These areas should be accurately located and

depicted on a map. The map should be included with the final RAW along with plans for sampling the "oil like" material.

If you should have any questions regarding this letter, please contact Mr. Michael Pfister, Engineering Geologist of the Fresno Responsible Party Unit, Brownfields and Environmental Restoration Program at (559) 297-3958.

Sincerely,

Thomas W. Kovac, P.E., Chief
Fresno Responsible Party Unit
Brownfields and Environmental Restoration Program

Attachment

cc: Ms. Jill Mross
Grant Administrator
North Fork Community Development Council
P.O. Box 1484
North Fork, California 93643

Ms. Janice Delaney
Senior Environmental Health Specialist
Resource Management Agency
Environmental Health
County of Madera
2037 West Cleveland Avenue, MS-E
Madera, California 93637

Ms. Marina Grigorova, P.E.
Bryan A. Stirrit & Associates
1360 Valley Vista Drive
Diamond Bar, CA 91765

Mr. Jeffrey Hannel
Regional Water Quality Control Board
1685 E Street
Fresno, California 93706-2020

MP:cm
MP02.128

cc: Mr. Russell Walls, P.E.
California Regional Water Quality Control Board
1685 E Street
Fresno, California 93706-2020

MP:cm
MP02.128

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Fresno Responsible Party Unit
Brownfields and Environmental Restoration Program
1515 Tollhouse Road
Clovis, CA 93611

Project Title: Former North Fork Mill Site, Brownfields Cleanup Project Removal Action Workplan

Project Location: 57839 Road 225, North Fork, CA 93643 (Unincorporated)
County: Madera

Project Description:

The goal of the Brownfields Cleanup Project is to remediate certain areas of the former North Fork Mill site. Specifically the goal is to remediate an area known as the former dip tank area and to remediate a waste pile known as waste pile #2. Surface soil in the former dip tank was found to contain dioxin at concentrations up to 10,500 ng/kg. The average concentration of dioxin in stockpile #2 was found to be 70.2 nanograms per kilogram (ng/kg). The Removal Action Workplan (RAW) indicates that soil from the dip tank area that contain dioxin and pentachlorophenol (PCP) above human health screening levels will be excavated and disposed of at offsite locations. Waste pile # 2 will also be removed. The removal action is necessary to remove the health risk posed by dioxins and PCP. By conducting the removal action, the threat to human health posed by contaminants in soil and in the waste pile will be removed.

The RAW states that a maximum of 1,000 cubic yards of soil will require removal. The estimated volume of material in the waste pile is 44 cubic yards. The majority of the excavation in the former dip tank area will be 12 inches deep. A small amount of soil to a depth of 5 feet will be excavated from two areas. The excavated soil will be sampled and some of the excavated soil will be disposed of at properly permitted disposal facilities. The estimated cost to implement the RAW is $150,000. The remediation goals for the soils removed are unrestricted future land use based on a U.S. EPA Region 9 Preliminary Remediation Goal of 3 mg/kg Pentachlorophenol and a California Health Safety Standard Limits List (CHSSL) Standard of 4.6 nanograms/kg for Dioxins (TEF adjusted for 2,3,7,8-TCDD)

Activities include excavation of contaminated soil, sampling of stockpiled soil, confirmation sampling in the excavated areas, removal of stockpiled soil, and backfilling in the excavated area, PCP and dioxin impacted soil will be transported and disposed at either Clean Harbor's Buttonwillow facility or Chemical Waste Management Kettleman Hills facility. Some non-hazardous waste without detectable petroleum concentrations may be transported to a Madera County landfill. A final report documenting site activities will be prepared and provided to DTSC.

Project History: The site is in a valley and consists of 128.5 acres, with six ponds, four water wells, three creeks and is at an average elevation of 2,600 feet. Peckinpah Creek flows north of the site; to the east are Douglas Ranger Station Road, Sierra National Forest, and scattered rural residences. To the west is the south fork of Willow Creek as well as residences that are adjacent to the site and Road 2256. There is a school that is 1.3 miles due west, a church one mile west and a museum a half mile away to the west on Road 225.

The site was operated as a lumber mill from 1942 to 1994. South Fork Timber Industries, Inc. was the last operator of the lumber mill, and in 1994 donated the property to the Redevelopment Agency of Madera County. In 2006, ownership of the site was transferred to the North Fork Community Development Council (NFCDC). During operations, logs were delivered to the site where they were stored on two log decks pending milling. Logs were milled in the main saw mill building; the cut lumber then passed through a dip tank. The wood was dipped to retard fungal growth, which could discolor the lumber. PCP was used in the dip solution until its use was discontinued in the 1980s. The lumber was dried in kilns, cooled, planed and stored on site pending sale. The original dip tank was in the west end of the main sawmill, subsequently the dip operation was moved about 200 feet northwest of the sawmill.

A wood waste-fired cogeneration plant was operated on site from 1987 to 1994. The facility was fired by wood waste generated in the production of lumber at the sawmill, as well as, wood from outside sources. Ash generated by the co-generation plant was stored onsite pending removal and off site disposal. Subsequent to the cessation of operations, equipment and buildings in the cogeneration plant were removed. In the late 1990s and over a period of about two years, U.S. EPA representatives completed soil assessment related activities at the site. As a result of this work, and other more recent assessment work, PCP was identified in site soils, and diesel and other fuels were identified in groundwater. The RWQCB has and is currently overseeing assessment work associated with petroleum hydrocarbon related contamination in site soil and groundwater. This contamination is the result of leakage from storage tanks that were previously utilized at

the site. The subject RAW is not intended to address releases associated with the petroleum hydrocarbon contamination at the site. In 2002 the County of Madera was the recipient of a $1,000,000.00 U.S. EPA Brownfields Cleanup Revolving Loan Fund (BCRLF). In 2003, County of Madera was the recipient of a Brownfields Assessment Grant from the U.S. EPA. This grant was for completing assessment work not associated with petroleum hydrocarbon contamination at the North Fork Mill site. The assessment work completed under the grant is summarized in a Remedial Investigation Report dated February 24, 2006. The Report summarizes assessment work in areas that are identified as follows: dip tank area, deck area between the drying kilns, drying kilns, west lumber yard, center lumber yard, on-site water holding ponds, and four "soil/ash piles located on a deck between Pekinpah Creek and Pitcher Creek diversion." In 2006 the NFCDC was the recipient of a Brownfields Cleanup Grant from the U.S. EPA. Information available indicates that funds from the Brownfields Cleanup Grant and from the BCRLF are to be utilized for the planned removal actions at the site.

The average concentration of dioxin in stockpile #2 was found to be 70.2 nanograms per kilogram (ng/kg). The California Human Health Screening Level (CHHSL) for an unrestricted residential land use is 4.6 ng/kg. The dioxin CHHSL for a commercial /industrial land use is 19.0 ng/kg. The concentration of dioxin in stockpile #2 exceeds the CHHSLs. Surface soil in the former dip tank was found to contain dioxin at concentrations up to 10,500 ng/kg, which also exceed screening levels. PCP was detected in soil samples collected from the dip tank area at concentrations up to 14 milligrams per kilogram (mg/kg), exceeding the U.S. EPA preliminary remediation goals.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Brian A. Stirrat & Associates
Exemption Status: (check one)

☐ Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
☐ Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]
☐ Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]
☐ Categorical Exemption: Title 14, California Code of Regulations, section 15330
☐ Statutory Exemptions: [State code section number]
☒ General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: With Certainty, No Possibility of a Significant Environmental Effect

Reasons Why Project is Exempt:

1. The site is on the Hazardous Waste and Substances Sites List pursuant to Government Code section 65692.5 (also known as the Cortese list). This listing is based on underground and above ground diesel and fuel oil tanks that are currently under remedial investigation by the Central Valley Regional Water Quality Control Board. These tanks and their contamination are between 300 and 500 feet away from the two proposed cleanup areas for PCP and dioxin. The tank releases are not related to the contamination to be remediated and are not known to be commingled.

2. The project will serve to restore the Site and to reduce the environmental and human health risk impact caused by the Site conditions by the removal and offsite disposal of contaminated soil. This will serve to eliminate unacceptable exposures to contaminated soil, and will effectively remove the potential for offsite contaminant migration from the proposed cleanup areas.

3. The removal action will be completed by a contractor who is a qualified California Class A Hazardous Waste Contractor. The Contractor will be responsible for and be prepared to take appropriate action in areas of health and safety, personnel protective equipment, dust control measures, Site security, and other activities associated with the handling, storing, transporting, and on-site management of a hazardous substance. Excavated material will be placed into Department of Transportation approved containers, (i.e. 20 cubic yard end dump trucks or 15 cubic yard roll off bins) and transported to an approved Hazardous Waste facility for disposal. There will be a decontamination area for cleaning of all equipment to prevent track-out of the contaminated media. All of the washout material will be drummed and manifested offsite according to its waste profile. Truck track out will be prevented by washing truck tires or by using a "shaker plate".

4. The Contractor will be required to implement a site specific Health and Safety Plan (HASP) that meets the requirements of Title 8 California Code of Regulations, Section 5192. The HASP shall contain a communication plan for responding to emergencies, and standard operating procedures for conducting project activities, including confined space entry, shoring of excavations and/or provision of exit ramps as required by Title 8. All personnel conducting work at the Site shall have the appropriate 40 hour Occupational Health and Safety training for hazardous waste workers. The HASP shall address workers breathing zone air monitoring activities for dust, and

volatile organic constituents as specified in the HASP and the appropriate level of personal protective equipment for all personnel at the Site during the project. Soil will be kept moist so that dust is not generated

5. Confirmation soil sampling will be conducted. This will ensure the attainment of cleanup criteria for the Site.

6. All on-site excavation and loading activities will take place between the hours of 8:00 am and 5:00 pm. Trucks transporting waste from the site will take the most direct route to the disposal locations and will avoid sensitive receptors, schools and traffic congestion

7. The remediation contractor will identify and confirm the location of underground utilities prior to the start of work.

8. The project is in areas that were previously fully developed. There are no significant sensitive biological resources in the area based on the California Department of Fish and Game's CNDDB (Rarefind) Database. No endangered species are known to inhabit the areas that will be remediated.

9. The project will not affect any known cultural resource area. The portion of the site to where the grading will occur is previously disturbed and filled. The dip tank area is unnaturally flat. Cut and fill have occurred of up to nine feet in depth to flatten the mill site. The area consists mostly of a cut slope with some minor fill on the southern edge of the dip tank. Investigative borings on the site corroborated this by showing that the alluvium is missing in some areas and the decomposed granite layers were exposed. However, the tribe involved with the redevelopment of the site will be present to observe activities. A cultural monitor representative from the North Fork Mono Rancheria will be present, when excavation related activities occur. This includes excavation activities associated with the onsite borrow soil that will be used as fill material. They have monitored prior activities at the site.

Mike Pfister	Engineering Geologist	559-297-3958
Project Manager Name	Project Manager Title	Phone #

Branch Chief Signature	Date

Thomas Kovac	Fresno Responsible Party Unit	559-297-3939
Unit Chief Name	Unit Chief Title	Phone #

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR: